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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X
In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors <sup>1</sup> .	: (Jointly Administered)
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**NINTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C.  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED  
AS CO-COUNSEL OF THE AD HOC COMMITTEE'S PROFESSIONALS FOR THE  
PERIOD OF JUNE 1, 2020 THROUGH AND INCLUDING JUNE 30, 2020**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	June 1, 2020 – June 30, 2020
Total Amount of Fees Incurred:	\$144,191.50
Total Fees Requested (80%):	\$115,353.20
Total Reimbursement of Expenses Incurred:	\$767.02
Total Reimbursement of Expenses Requested (100%):	\$767.02
Total compensation and Reimbursement Requested in this Statement:	\$116,120.22
This is Applicant's:	Ninth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Ninth Monthly Fee Statement (the "Fee Statement") for the period of June 1, 2020 through and including June 30, 2020 (the "Statement Period").

#### **Itemization of Services Rendered and Disbursements Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$144,191.50 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$115,353.20.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,040.71<sup>2</sup>. The Blended hourly rate of all paraprofessionals is \$305.00<sup>3</sup>. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$767.02 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors (the "Allocation Fees"). Pursuant to the Fee Assumption Order, Applicant may request Allocation Fees through a separate application at a later date.

#### **Notice**

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests

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<sup>2</sup> The blended hourly billing rate of \$1,040.71 is derived by dividing the total fees for attorneys of \$143,825.50 by the total hours of 138.2.

<sup>3</sup> The Blended hourly billing rate of \$305.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$366.00 by the total hours of 1.2.

(i) compensation in the amount of \$115,353.20 which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in connection with such services during the Statement Period (*i.e.*, \$144,191.50) and (ii) payment of \$767.02 for the actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: September 25, 2020

New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski  
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Jennifer S. Feeney, Esq.  
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*Co-Counsel to the Ad Hoc Committee of  
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**EXHIBIT A**

**Fees By Project Category**

**SUMMARY OF COMPENSATION BY PROJECT CODE  
FOR THE STATEMENT PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
PU01	Asset Analysis and Recovery	11.5	\$13,200.00
PU03	Business Operations	5.4	\$6,868.50
PU04	Case Administration	24.0	\$29,528.50
PU05	Claims Analysis	74.5	\$68,290.50
PU06	Employment and Fee Applications	2.1	\$1,458.00
PU09	Meetings and Communications w/ AHC	19.9	\$23,146.00
PU11	Plan and Disclosure Statement	2.0	\$1,700.00
	<b>TOTALS:</b>	<b>139.4</b>	<b>\$144,191.50</b>

**EXHIBIT B**

**Professional and Paraprofessional Fees**

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE STATEMENT PERIOD**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1315.00	77.7	\$102,175.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	37.5	\$31,875.00
Michael A. Pantzer ("MAP") Associate	2017	\$425.00	23.0	\$9,775.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	1.2	\$366.00
	<b>TOTAL</b>		<b>139.4</b>	<b>\$144,191.50</b>



**EXHIBIT C**

**Time Detail**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

September 9, 2020  
BILL NO. 212293

For Services Rendered Through June 30, 2020:

Phase: PU01		ASSET ANALYSIS AND RECOVERY	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/20 JKH	Review Documents Review agenda for hearing	.20	61.00
06/02/20 JSF	Examine Documents Examine Documents: Review of UCC Letter to Court re: Discovery Issues with IACs	.30	255.00
06/05/20 JSF	Examine Documents Review of Letters to Court From Sackler Parties, Norton Rose and NCSG in Response to UCC Letter to Court re: Discovery Deficiencies	.80	680.00
06/09/20 JSF	Examine Documents Review of Norton Rose Due Diligence Database - New Information Available	.30	255.00
06/09/20 MLC	Analysis of Memorandum Review of memorandum from KL concerning discovery due diligence including Houlihan analysis	.80	1,052.00

OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 2

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/20 MLC	Correspondence Review of email string between the (i) UCC's, AHC's and Debtors' financial advisors and (ii) Mundipharma's senior management team re IAC due diligence	.70	920.50
06/11/20 JSF	Telephone Call(s) Update from Houlihan and FTI re: Due Diligence on IACs and Domestic Business Plans	1.00	850.00
06/11/20 MLC	Conference call(s) Conference call with AHC subcommittee re diligence and related issues	1.10	1,446.50
06/11/20 MLC	Analysis of Memorandum Review of summary of discovery update re Sacklers and underlying letter responses	1.20	1,578.00
06/12/20 MLC	Correspondence Correspondence with NCSG re non-cash transfer IC report	.40	526.00
06/12/20 MLC	Correspondence Correspondence re company due diligence reports	.30	394.50
06/17/20 MLC	Review Financial Documents Review of April business plan update analysis and Project Malta sale process update prepared by FTI	1.80	2,367.00

OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 3

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/22/20 MLC	Analysis of Memorandum Review and analysis of information deck prepared by FTI and Houlihan concerning Companies' assets	.80	1,052.00
06/23/20 JSF	Examine Documents Review of FTI Updated Cash Available Analysis	.40	340.00
06/24/20 JSF	Examine Documents Review of Company Presentation re: Updated Value Analysis of Assets and Sale Scenario Analysis	.60	510.00
06/26/20 JSF	Examine Documents Review of NCSG Motion for 2004 Discovery and Consideration of AHC Joinder to Motion	.30	255.00
06/26/20 MLC	Conference call(s) Discovery Rule 2004 motion conference with AHC counsel	.50	657.50
TOTAL PHASE PU01		11.50	\$13,200.00

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Phase: PU03	BUSINESS OPERATIONS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 4

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/09/20 JSF	Telephone Call(s) Conference Call with Dr. Brenkus re: HRT	.50	425.00
06/09/20 MLC	Conference call(s) Conference call with UCC, AHC, NSCG with Dr Brenkus	1.20	1,578.00
06/12/20 MLC	Conference call(s) Conference call/webex session with FTI/Houlihan with AHC and NCSG re business operations of debtors	.50	657.50
06/17/20 MLC	Analysis of Memorandum Review of UCC statement re amended motion to enter into funding agreement with HRT	.70	920.50
06/18/20 MLC	Analysis of Memorandum Review and analysis of UCC statement re HRT motion by Debtors	1.10	1,446.50
06/21/20 MLC	Analysis of Memorandum Review of AHC draft pleading on HRT	.30	394.50
06/23/20 MLC	Court Appearance - General Hearing on HRT motion, as amended, by Debtors	1.10	1,446.50
TOTAL PHASE PU03		5.40	\$6,868.50

Phase: PU04

CASE ADMINISTRATION

OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 5

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/20 MLC	Conference call(s) Conference call with co-counsel	1.20	1,578.00
06/02/20 MLC	Conference call(s) Conference call with counsel and UCC re Dr Brenkus and HRT motion	1.10	1,446.50
06/02/20 MLC	Telephone Call(s) Telcon with David Molton re status of mediation and next steps re plan	.40	526.00
06/02/20 MLC	Analysis of Memorandum Review of supplemental pleadings filed in connection with bar date motion	1.30	1,709.50
06/02/20 JKH	Prepare Legal Papers Preparation for hearing on bar date motion. Assemble Agenda and Pleadings	.20	61.00
06/03/20 MLC	Analysis of Memorandum Review of proposed discovery stipulation prepared by UCC and accompanying side letter with AHC	1.30	1,709.50
06/03/20 MLC	Court Appearance - General Court hearing on bar date motion and responses	2.50	3,287.50

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Client/Matter: 20186/0002  
Page 6

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/20 MLC	Conference call(s) Follow up conference call with Leftwich, Peacock, Guard, Eckstein, Ringer and Singer re court hearing, bar date and next steps	.90	1,183.50
06/03/20 JKH	Diary & Docket Review bar date order granting extension and calendaring same	.20	61.00
06/04/20 MLC	Conference call(s) Conference call with DPW and KL re AHC and bar date extension of date	.50	657.50
06/04/20 MLC	Correspondence Correspondence concerning protective order agreement with Sacklers and Purdue	.40	526.00
06/04/20 MLC	Correspondence Correspondence with supporting states concerning report from Court hearing and extension of bar date	.80	1,052.00
06/04/20 MLC	Draft/revise Reviewed revisions to draft side letter to Akin/UCC discovery sharing agreement	1.10	1,446.50
06/04/20 MLC	Correspondence Correspondence with Akin re draft sharing agreement	.30	394.50

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Client/Matter: 20186/0002  
Page 7

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/05/20 MLC	Correspondence Review of memo summarizing court hearing and related bar date extension issues	.70	920.50
06/05/20 MLC	Analysis of Memorandum Review of letter from Haug Partners to Court	.60	789.00
06/09/20 MLC	Draft/revise Review of proposed revisions to draft side letter to UCC information sharing agreement	.40	526.00
06/13/20 MLC	Correspondence Correspondence re scheduling of meeting re class action opposition	.20	263.00
06/15/20 MLC	Analysis of Memorandum Review of comments from fee examiner and responses thereto	.90	1,183.50
06/18/20 JSF	Examine Documents Review Update to AHC and Professionals re: Status of Pending Motions and Action Items	.60	510.00
06/18/20 MLC	Draft/revise Review and revision to draft of letter to fee examiner responding to various questions	.80	1,052.00



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Client/Matter: 20186/0002  
Page 8

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/18/20 MLC	Analysis of Memorandum Review of summary memo prepared by KL re recent filings in case	1.30	1,709.50
06/21/20 MLC	Analysis of Memorandum Review of KL comments to side letter to UCC	.30	394.50
06/22/20 JSF	Telephone Call(s) Conference Call with Reps of DOJ, AD Hoc Professionals and NCSG Professionals re: Update on Various Pending Matters	1.70	1,445.00
06/22/20 MLC	Conference call(s) Conference call with various staff from DOJ, counsel for NCSG and MSG and AHC, and committee members re overview of mediation and plan development	1.60	2,104.00
06/23/20 JSF	Telephone Call(s) Telephonic Participation in Court Hearing re: HRT Agreement	1.20	1,020.00
06/24/20 MLC	Conference call(s) Call with Ken Eckstein and Rachael Ringer re plan issues	.50	657.50
06/24/20 MLC	Conference call(s) Conference call with Andrew Troop and Jim Donahue re proof of claim process	.50	657.50

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 9

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/30/20 MLC	Conference call(s) Conference call with AHC counsel (Eckstein and Ringer) re upcoming hearing	.50	657.50
TOTAL PHASE PU04		24.00	\$29,528.50

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Phase: PU05	CLAIMS ANALYSIS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/20 JSF	Examine Documents Examine Documents: Review of Pleadings from Various Consituencies in Support of or Objecting to Motion to Extend Bar Date	.30	255.00
06/03/20 JSF	Telephone Call(s) Participate in Telephonic Hearing re: Extension of Bar Date	2.40	2,040.00
06/04/20 JSF	Examine Documents Examine Documents: Review of Bar Date Order, Notice and Related Materials	1.00	850.00
06/04/20 MLC	Analysis of Memorandum Review of draft of consolidated POC letter	1.30	1,709.50
06/04/20 MAP	Review Documents Review and make edits to consolidate claims materials	.90	382.50

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 10

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/05/20 JSF	Telephone Call(s) Call with A, Troop and Kramer Levin re: Response to IPSD Motion to File Consolidated Claim	.40	340.00
06/05/20 JSF	Examine Documents Review of IPSD Motion to File Consolidated Claim	.40	340.00
06/05/20 MLC	Conference call(s) Meeting with Pillsbury and KL re status of preparation of States' class claims	1.10	1,446.50
06/05/20 MLC	Analysis of Memorandum Review of public school class certification motion	1.30	1,709.50
06/07/20 MLC	Analysis of Memorandum Analysis of memorandum re IPSDs Class Certification Motion	.80	1,052.00
06/08/20 JSF	Telephone Call(s) Call with States Reps re: Proof of Claim Form and Required Information	1.40	1,190.00
06/08/20 JSF	Examine Documents Review of Proof of Claim Forms, Bar Date Order and Required Information for Governmental Entities to Submit Omnibus Claim to Debtors	2.30	1,955.00

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Client/Matter: 20186/0002  
Page 11

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/08/20 MLC	Conference call(s) Conference call with MAP and JSF re undertaking research re certain States' claims	.50	657.50
06/08/20 MAP	Conference call(s) Call with states reps regarding aggregate proof of claim and supporting documentation	1.40	595.00
06/08/20 MAP	Telephone Call(s) Call with JSF and MLC regarding aggregate proof of claim and reservation of rights language	.50	212.50
06/09/20 JSF	Telephone Call(s) Call with States re: Status and Proof of Claim Process	.50	425.00
06/09/20 MLC	Conference call(s) Call with Brattle and States re follow up to development of States POC	.50	657.50
06/09/20 MLC	Draft/revise Drafting and revising of reservation provision in draft proof of claim form	1.30	1,709.50
06/09/20 MLC	Correspondence Correspondence with Troop and Brattle concerning draft of consolidated states proof of claim	.50	657.50

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Client/Matter: 20186/0002  
Page 12

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/09/20 MAP	Research Research Mass Tort Bankruptcy Proofs of Claim for purpose of drafting reservation of rights for Government Entities Consolidated Proof of Claim	3.30	1,402.50
06/09/20 MAP	Review Documents Review Bar Date Order for purpose of drafting reservation of rights for Government Entities Consolidated Proof of Claim	1.00	425.00
06/09/20 MAP	Draft/revise Draft Reservation of Rights for Government Entities Consolidated Proof of Claim	3.90	1,657.50
06/10/20 JSF	Examine Documents Review of Outline to Objection to IPSP Motion to Certify Class	.30	255.00
06/10/20 MLC	Analysis of Memorandum Reviewed and analyzed outline of AHC objection to the IPSPs' class certification motion	1.20	1,578.00
06/10/20 MAP	Draft/revise Revise reservation of rights language for Government Entities consolidated proof of claim	1.50	637.50

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Client/Matter: 20186/0002  
Page 13

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/11/20 MLC	Analysis of Memorandum Review of comments from Troop to draft opposition to class certification motion	.40	526.00
06/12/20 JSF	Telephone Call(s) Call with Purdue Professionals re: Letter to go to States, Cities and Municipalities Advising of Bar Date and Ability to Join in Omnibus Claim by AHC	.50	425.00
06/12/20 JSF	Examine Documents Review Draft Materials - Letter and Exhibits - to Governmental Entities re: Filing Omnibus Claim by AHC	.90	765.00
06/12/20 JSF	Examine Documents Bar Date Order re: Filing Omnibus Claim by AHC for Governmental Entities	.30	255.00
06/12/20 MLC	Conference call(s) Conference call with AHC counsel, Troop and MacClay re class claim opposition	.50	657.50
06/12/20 MLC	Analysis of Memorandum Review and analysis of MAP memorandum re class action certification cases	1.40	1,841.00
06/12/20 MLC	Correspondence Correspondence with MSGE, NCSG and AHC counsel re class action certification motion and relationship to MDL	.50	657.50

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Client/Matter: 20186/0002  
Page 14

September 9, 2020  
BILL NO. 212293

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06/12/20 MLC	Draft/revise Reviewed and revised draft of consolidated states POC - reservation provisions	1.70	2,235.50
06/12/20 MAP	Research Per MLC research on class certification within class settlements in regrad to school district class POC.	.80	340.00
06/12/20 MAP	Telephone Call(s) Phone Call with MLC re assignment on class certification for class action settlement in connection with school district class POC.	.10	42.50
06/13/20 MLC	Analysis of Memorandum Review of comments received from NC DOJ re class action certification motion opposition	.50	657.50
06/14/20 JSF	Examine Documents Review of Draft Letter to Governmental Entities re: Bar Date and Filing of Aggregate Claims	.40	340.00
06/14/20 MLC	Draft/revise Review of proposed revisions to draft consolidated state proof of claim	.70	920.50

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Client/Matter: 20186/0002  
Page 15

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/15/20 JSF	Prepare Legal Papers Prepare Draft of Language for Proof of Claim Form from Order re: Authorization to File and Consenting Claimants and Compare to Bar Date Order Language	.80	680.00
06/15/20 JSF	Telephone Call(s) Call with AHC Professionals re: Filing POC as AHC Counsel for Government Claimants	.30	255.00
06/15/20 MLC	Conference call(s) Follow up conference call with counsel re claims analysis process	.70	920.50
06/15/20 MLC	Draft/revise Reviewed proposed revisions and made other revisions to consolidated states POC	1.60	2,104.00
06/16/20 MLC	Conference call(s) Conference call with States and Brattle concerning analysis of underlying units of claims	.80	1,052.00
06/16/20 MLC	Telephone Call(s) Telcon with Andrew Troop and Jim Donahue re claims' analysis of consolidated state claim	.80	1,052.00
06/16/20 MLC	Draft/revise Reviewed and revised narrative to consolidated states proof of claim	1.40	1,841.00



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Client/Matter: 20186/0002  
Page 16

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/17/20 JSF	Examine Documents Review AHC Draft Response to Motion of IPSP for Class Certification	.40	340.00
06/17/20 MLC	Correspondence Correspondence with NCSG re proposed revisions to opposition to class action certification motion	.30	394.50
06/18/20 JSF	Examine Documents Review of NCSG Mark-Up of Objection to IPSP Motion for Class Certification	.20	170.00
06/18/20 JSF	Examine Documents Review of Revised Materials to Governmental Entities Re: Bar Date and Process for Filing Consolidated Claim	.60	510.00
06/18/20 MLC	Analysis of Memorandum Review of the draft memo re class action certification opposition	.80	1,052.00
06/19/20 MLC	Analysis of Memorandum Review and analysis of Kentucky Purdue settlement agreement	.90	1,183.50
06/19/20 MLC	Analysis of Memorandum Review of Nevada proof of claim draft	.40	526.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 17

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/20/20 MLC	Draft/revise Reviewed and revised draft of consolidated states POC reservation section	2.10	2,761.50
06/20/20 MAP	Correspondence Email MLC reservation of rights language for consolidated POC	.10	42.50
06/23/20 MLC	Conference call(s) Conference call with Andrew Troop and Jim Donahue re analysis of States' consolidated claim	.70	920.50
06/24/20 JSF	Examine Documents Review of Bar Date Order and Transcript for Filing Consolidated Claim for States	.40	340.00
06/24/20 MLC	Prepare for Meeting Prepare for call re proof of claim memorandum	.40	526.00
06/25/20 JSF	Examine Documents Review of Materials for Presentation to States re: Filing Consolidated Claim Per Bar Date Order	.80	680.00
06/25/20 MAP	Draft/revise Revise Consolidated Claims Reservation of Rights and integrate language into Consolidate Claim background section	2.10	892.50

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 18

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/26/20 JSF	Examine Documents Review Presentation to States re: Bar Date and Consolidated Proof of Claim, Including Bar Date Order Provisions and Governmental POC	1.60	1,360.00
06/26/20 MLC	Conference call(s) Conference call with Singer, Leftwich, Ringer and Eckstein re consolidated state claims analysis	.60	789.00
06/26/20 MLC	Conference call(s) Conference call with States re bar date and consolidated proof of claim	.70	920.50
06/26/20 MLC	Draft/revise Drafted and revised presentation of powerpoint re bar date and consolidated proof of claim	4.10	5,391.50
06/26/20 MAP	Draft/revise Per MLC - Revise powerpoint slides for presentation to states regarding consolidated proof of claim	1.30	552.50
06/30/20 JSF	Telephone Call(s) Call with Counsel for NCSG re: Coordinating States for Filing of Consolidated POC Per Bar Order	.70	595.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 19

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/30/20 JSF	Telephone Call(s) Call with All States to Discuss Process for Filing Consolidated POC Under Bar Order	.70	595.00
06/30/20 JSF	Examine Documents Review of Addendum for Each State to Proof of Claim Regarding Bases for Claims and Analysis of Revisions to State Specific Form	.80	680.00
06/30/20 JSF	Prepare Legal Papers Revisions to State Form Supplementing Consolidated Claim to Be Filed on Behalf of All States and Territories	1.40	1,190.00
06/30/20 MLC	Conference call(s) Conference call with Andrew Troop and Jim Donahue re bar date and gathering of States' information	.50	657.50
06/30/20 MLC	Conference call(s) Conference call with State re gathering of information for preparation of proof of claim	.70	920.50
06/30/20 MAP	Telephone Call(s) Phone call with MLC and JSF regarding consolidated claim supplement and authorization form	.30	127.50

OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 20

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/30/20 MAP	Draft/revise Draft supplement to consolidated claim and authorization form	5.70	2,422.50
06/30/20 MAP	Draft/revise Review edits to reservation of rights language from Pilsbury	.10	42.50
TOTAL PHASE PU05		74.50	\$68,290.50

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Phase: PU06	EMPLOYMENT & FEE APPLICATIONS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/20 JSF	Examine Documents Revise and Finalize April Fee Statement	.30	255.00
06/26/20 JSF	Prepare Legal Papers Prepare and Review Monthly Fee Statement for May	1.20	1,020.00
06/26/20 JKH	Prepare Papers Prepare monthly statement	.60	183.00
TOTAL PHASE PU06		2.10	\$1,458.00

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Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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Client/Matter: 20186/0002  
Page 21

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/20 MLC	Conference call(s) Status update conference call with consenting states	.90	1,183.50
06/01/20 MLC	Conference call(s) Conference call with co-counsel re status update and next steps re pending motions before court and related issues	.50	657.50
06/01/20 MLC	Prepare for Meeting Prepared outline in preparation for call with consenting states re update on pending motions and related issues	1.30	1,709.50
06/03/20 JSF	Telephone Call(s) Telephone Call with AHC. Weekly AHC Meeting	1.80	1,530.00
06/03/20 MLC	Conference call(s) weekly conference call meeting of the AHC (MLC portion)	1.10	1,446.50
06/05/20 JSF	Examine Documents Review of Case Updates to AHC	.50	425.00
06/14/20 JSF	Examine Documents Review of E-Mail Update to AHC re: HRT and IPSD Motion for Class Certification	.20	170.00
06/17/20 JSF	Telephone Call(s) Participate in AHC Weekly Conference Call	1.00	850.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 22

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/17/20 MLC	Conference call(s) Weekly AHC meeting	1.10	1,446.50
06/18/20 MLC	Telephone Call(s) Telcon with Paul Singer re follow up to aggregate proof of claim process	.50	657.50
06/21/20 MLC	Correspondence Review of counsel memo to AHC committee members re pending motions before the court	.60	789.00
06/22/20 MLC	Telephone Call(s) Telcon with Ken Eckstein and Paul Singer re status of mediation discussions and next steps	.90	1,183.50
06/22/20 MLC	Analysis of Memorandum Analysis of memo from KL to AHC concerning response to HRT	.60	789.00
06/22/20 MLC	Correspondence Correspondence among AHC members re HRT motion and response	.50	657.50
06/24/20 JSF	Telephone Call(s) Weekly Conference Call with AHC to Discuss Case Updates	1.60	1,360.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 23

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/24/20 JSF	Telephone Call(s) Call with P. Singer (TX) and Michael Leftwich (TN) re: Communications with States, Exclusivity Issues, Plan Process, DOJ Discussions	1.20	1,020.00
06/24/20 MLC	Telephone Call(s) Telcon with Paul Singer re plan issues and negotiations with other governmental parties	.80	1,052.00
06/24/20 MLC	Conference call(s) AHC committee meeting	1.80	2,367.00
06/24/20 MLC	Conference call(s) Follow up call with John Guard, Paul Singer, Michael Leftwich, Eckstein and Ringer re plan development issues	.80	1,052.00
06/28/20 JSF	Examine Documents Review of Update to AHC on Action Items (Motions and Approval of Fee Statements)	.20	170.00
06/30/20 MLC	Conference call(s) Meeting with AHC, NCSG and MSGE re bankruptcy plan issues	2.00	2,630.00
TOTAL PHASE PU09		19.90	\$23,146.00

Phase: PU11

PLAN & DISCLOSURE STATEMENT



OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 24

September 9, 2020  
BILL NO. 212293

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/20 JSF	Examine Documents Review Rearch Re: Settlement Structure to incorporate into plan of reorganization and related issues re: mass tort plans	.30	255.00
06/30/20 JSF	Telephone Call(s) Participate in Conference Call with NCSG, MSG and AHC re: Possible Plan Structure, Plan Issues and Classification	1.70	1,445.00
TOTAL PHASE PU11		2.00	\$1,700.00
		TOTAL FOR SERVICES	\$144,191.50

**EXHIBIT D**

**Summary of Actual and Necessary Expenses**

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE  
STATEMENT PERIOD**

<b>Expense Category</b>	<b>Total Expenses</b>
Conference Call(s)	\$767.02 <sup>1</sup>
<b>TOTAL:</b>	<b>\$767.02</b>

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<sup>1</sup> This relates to the following conference calls: (1) conference call on February 26, 2020 for \$658.28, lasting approximately 30 minutes in which 44 people participated; (2) a conference call on May 12, 2020 for \$37.49, lasting approximately 20 minutes, in which 4 people participated; and (3) a conference call on May 7, 2020 for \$71.25, lasting approximately 75 minutes, in which 14 people participated.

**EXHIBIT E**

**Expense Detail**

OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 25

September 9, 2020  
BILL NO. 212293

DISBURSEMENTS FOR YOUR ACCOUNT

Conference Call(s)	767.02
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TOTAL DISBURSEMENTS	<hr/> 767.02
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